IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

THE GILLETTE COMPANY,)	
Plaintiff,)	
V.)	
SUSAN HARRISON; WILLIAM G.)	
HARRISON III, individually and as a Trustee for the Harrison Family Trust and The Emily)	C.A. No. 06-443-GMS
Waldrip Trust; CINDY NOSSER; KATHY ALLEN; PAT ALLEN; TINA HARRISON;)	
W.G. HARRISON IV; LARRY)	
LUXENBERG; and JOHN SHELTON,)	
Defendants.)	

STIPULATION AND ORDER REGARDING DEPOSITION TESTIMONY

WHEREAS, the parties in the above-captioned action (the "Delaware Action") are also engaged in litigation in the Northern District of Texas styled Susan Harrison, et al. v. The Procter & Gamble Company, et al., C.A. No. 06-121-R (the "Texas Action");

WHEREAS, discovery is proceeding in the Texas Action that involves overlapping documents and depositions; and

WHEREAS, the parties have agreed that any deposition of the parties and/or witnesses common to both the Delaware and Texas Actions may be used by any party for any lawful purpose in either the Delaware or Texas Action;

IT IS THEREFORE STIPULATED AND AGREED, by and between counsel for the parties and subject to the approval of the Court, that any depositions of the parties and witnesses common to both the Delaware and Texas Action, taken by the parties in connection with the Texas Action, may be used by any party for any lawful purpose in the Delaware Action, including, but not limited to, motion practice and at trial and, in that respect, shall be deemed admissible under the Federal Rules of Evidence.

Allen M. Terrell, Jr. (#709 Terrell@rlf.com Anne Shea Gaza (#4093) Gaza@rlf.com Richards, Layton & Finger, P.A. One Rodney Square P.O. Box 551 Wilmington, DE 19899-0551 (302) 651-7539 Attorneys for Plaintiff The Gillette Company

OF COUNSEL: David Keltner William Warren Hugh Connor Michael Anderson Kelly Hart & Hallman LLP 201 Main Street **Suite 2500** Fort Worth, TX 76102 (817) 332-2500

Dated: January 14, 2008

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/s/ Daniel B. Rath

Daniel B. Rath (#3022) Rebecca L. Butcher (#3816) James S. Green, Jr. (#4406) LANDIS, RATH & COBB, LLP 919 Market Street, Suite 600 Wilmington, DE 19801 (302) 467-4400 Attorneys for Defendants Defendants Susan Harrison; William G. Harrison III, individually and as a Trustee for the Harrison Family Trust and The Emily Waldrip Trust; Cindy Nosser; Kathy Allen; Pat Allen; Tina Harrison; W.G. Harrison IV; Larry Luxenberg; and John Shelton

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OF COUNSEL: Robert L. Chaiken Kenneth B. Chaiken CHAIKEN & CHAIKEN, P.C. One Galleria Tower 13355 Noel Road, Suite 600 Dallas, TX 75240 (214) 265-0250

Dated: January 14, 2008

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	CIL: CT. J. C.	N C14
	Chief Judge Gregor	y IVI. Sieet